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9 Attorneys for Defendant  
JASON EDWARD THOMAS CARDIFF  
10

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA  
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS  
18 CARDIFF,

19 Defendant.  
20  
21

Case No. 5:23-cr-00021-JGB

**DECLARATION OF COUNSEL IN  
SUPPORT OF *EX PARTE*  
APPLICATION FOR EXTENSION  
OF TIME TO FILE REPLY BRIEFS  
IN SUPPORT OF MOTION TO SET  
ASIDE JUDGMENT FOR JASON  
CARDIFF, AND SURETIES LILIA  
MURPHY AND BRIAN KENNEDY**

22 I, Stephen R. Cochell, declare as follows:

- 23 1. I represent Jason Cardiff in this matter and also represent Brian Kennedy and  
24 Lilia Murphy, the Sureties in this matter. I have personal knowledge of the  
25 matters and make this declaration in support of Jason Cardiff's *Ex Parte*  
26 Application for Extension of Time to File Jason Cardiff's Reply Brief in  
27 Support of Motion to Set Aside Judgment.  
28 2. Late Monday afternoon, I underwent a biopsy due to a probable cancer

1 diagnosis. As a result of the biopsy and medical treatment, starting on  
2 Wednesday, April 9, 2025, I experienced significant side effects from the  
3 biopsy including fever, chills, fatigue, and dizziness. I did not anticipate that  
4 the symptoms would continue past Wednesday.

5 3. These symptoms have severely limited my ability to work. Despite being  
6 prescribed antibiotics and bedrest, I remain unable to focus and perform legal  
7 drafting effectively. With the assistance of Jonathan Slotter, I was able to  
8 prepare this motion.

9 4. Two reply briefs for Mr. Cardiff and the Sureties in this matter are currently  
10 due on April 14, 2025. Due to my medical condition, I will be unable to meet  
11 this deadline.

12 5. I respectfully request a 14-day extension, to and including April 28, 2025, to  
13 file both reply briefs.

14 6. On April 11, 2025, I contacted AUSA Valerie Makarewicz and Manu J.  
15 Sebastian to inform them of this *ex parte* request. The government has yet to  
16 respond to my request.

17 7. This request is made with good cause and is not made for purposes of delay. I  
18 believe it is necessary to preserve the rights of my client(s) and ensure full  
19 and fair presentation of the legal issues before the Court.

20 8. Granting this extension will not delay justice, but rather serve it, as it will  
21 allow for thoughtful and complete briefing of issues that may impact the  
22 outcome of this case.

23 Executed on this 11th day of April, 2025, at Houston Texas.

24  
25 /s/ Stephen R. Cochell  
26 Stephen R. Cochell  
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